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and Certain of Its Affiliates*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING THE MOTION OF
LEHMAN BROTHERS HOLDINGS INC. FOR EXTENSION OF THE
PERIOD TO FILE OBJECTIONS TO AND REQUESTS TO ESTIMATE CLAIMS**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On May 22, 2015, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors*, filed the Motion of Lehman Brothers Holdings Inc. for Extension of the Period to File Objections to and Requests to Estimate Claims [ECF No. 49709] (the "Motion") with the Court for hearing.

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Objection Deadline”) for parties to object or file responses to the Motion. The Objection Deadline was set for June 5, 2015 at 4:00 p.m. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. On June 5, Highland CDO Opportunity Master Fund, L.P. filed an objection to the Motion (the “Highland Objection”), solely with respect to proof of claim number 16838 (the “Highland Claim”), and not with respect to any other claim. *See* ECF No. 49916 ¶¶ 3, 12.

4. The Objection Deadline has now passed and, to the best of my knowledge, other than the Highland Objection, no responsive pleadings to the Motion have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator that have not been withdrawn. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Motion annexed hereto as Exhibit A be entered in accordance with the procedures described in the Second Amended Case Management Order. The proposed order has been modified only to clarify that the Motion is not being granted with respect to the Highland Claim, that the proposed order is without prejudice to the Highland Objection or the Plan Administrator’s rights to oppose the Highland Objection.

I declare that the foregoing is true and correct.

Dated: June 29, 2015
New York, New York

/s/ Garrett A. Fail
Garrett A. Fail

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Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**ORDER EXTENDING THE PERIOD TO FILE
OBJECTIONS TO AND REQUESTS TO ESTIMATE CLAIMS**

Upon the motion, dated May 22, 2015 (the “Motion”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to sections 105(a) and 1142(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure, to extend the Objection Deadline, as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and upon the objection of Highland CDO Opportunity Master Fund, L.P. (the “Highland Objection”), solely with respect to proof of claim 16838 (the “Highland Claim”) [ECF No. 49916]; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided in accordance with the procedures set forth in the second amended order entered June 17, 2010 governing case management and administrative procedures [ECF No. 9635] to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) all parties who have requested notice in these chapter 11 cases; and (vi) all holders of Disputed Claims, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted to the extent provided herein; and it is further

ORDERED that, except with respect to the Highland Claim, the Objection Deadline imposed by section 9.1 of the Plan is hereby extended for a period of eighteen (18) months to March 6, 2017, without prejudice to the ability of the Plan Administrator to request further extensions; and it is further

ORDERED that this order is without prejudice to the Highland Objection, or to the Plan Administrator's rights to oppose the Highland Objection and continue to prosecute the Motion with respect to the Highland Claim; and it is further

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2015
New York, New York

UNITED STATES BANKRUPTCY JUDGE